

EXHIBIT A



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

February 28, 2018

VIA EMAIL AND U.S. MAIL

Wesley G. Barr
The Olinde Firm, LLC
400 Poydras Street Suite 1980
New Orleans, LA 70130
wbarr@olindefirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Pimentel, Carlos v. 3M Company et al Case No.: 0:17-cv-03899-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Pimentel_Carlos_017-cv-03899_1_Pimentel_Carlos_017-cv-03899_1"

Pimentel_Carlos_017-
cv-
03899_1_Pimentel_Car
los_017-cv-03899_1

PLAINTIFFS' LAST NAME - Pimentel
PLAINTIFFS' FIRST NAME - Carlos
CASE NO. - 0:17-cv-03899
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 06, 09
SECTION III (SURGERY INFORMATION) -
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) -
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - The Olinde Firm, LLC
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - wbarr@olindefirm.com



Benjamin W. Hulse
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April 2, 2018

VIA EMAIL AND U.S. MAIL

Amanda M Williams
Gustafson Gluek PLLC
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
awilliams@gustafsongluek.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Adams, Artis v. 3M Company et al Case No.: 0:17-cv-04467-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Title "Adams_Artis _17-cv-04467_1_Adams_Artis _17-cv-04467_1"

Adams_Artis _17-cv-
04467_1_Adams_Artis
_17-cv-04467_1

PLAINTIFFS' LAST NAME - Adams
PLAINTIFFS' FIRST NAME - Artis
CASE NO. - 17-cv-04467
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 06
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 01, 03
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) -
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION -
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Gustafson Gluek
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - awilliams@gustafsongluek.com



Benjamin W. Hulse
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September 10, 2018

VIA EMAIL AND U.S. MAIL

Wesley G. Barr
The Olinde Firm, LLC
400 Poydras Street Suite 1980
New Orleans, LA 70130
wbarr@olindefirm.com
folinde@olindefirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Carter, Gregory v. 3M Company et al Case No.: 0:18-cv-01416-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Carter
Plaintiffs' First Name	Gregory
Case No.	0:18-cv-01416
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	1
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	The Olinde Firm, LLC
I.03.e - Plaintiffs' Counsel's Email	folinde@olinfefirm.com

EXHIBIT B



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

August 3, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
(*Kohout*), *Barnes, Shirley v. 3M Company* Case No.: 0:16-cv-00798-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Kohout
Plaintiffs' First Name	Richard
Case No.	0:16-cv-00798
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	09, 10,
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
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E-Mail: bhulse@blackwellburke.com

August 3, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Bond, Karen (OBO Thomas Bond) v. 3M Company Case No.: 0:16-cv-04161-
JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Bond
Plaintiffs' First Name	Thomas
Case No.	0:16-cv-04161
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	08, 09, 10, 12,
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

June 22, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Ussery v. 3M Company et al Case No.: 0:17-cv-01703-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Ussery
Plaintiffs' First Name	Bruce
Case No.	0:17-cv-01703
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01, 02, 03, 04, 05
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

August 30, 2018

VIA EMAIL AND U.S. MAIL

Daniel Christopher Burke
Bernstein Liebhard LLP
10 E. 40th Street
New York, NY 10016
dburke@bernlieb.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Henderson, Stephanie v. 3M Company et al Case No.: 0:17-cv-04517-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Henderson
Plaintiffs' First Name	Stephanie
Case No.	0:17-cv-04517-JNE-FLN
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01 05 07 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Bernstein Liebhard
I.03.e - Plaintiffs' Counsel's Email	dburke@bernlieb.com dlee@bernlieb.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

April 17, 2018

VIA EMAIL AND U.S. MAIL

Daniel C. Burke
Bernstein Liebhard LLP
10 E. 40th Street
New York, NY 10016
dburke@bernlieb.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Edwards, Renate v. 3M Company et al Case No.: 0:17-cv-04891-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Edwards _Renate _17-CV-04891_1_Edwards _Renate _17-CV-04891_1"

Edwards _Renate _17-
CV-04891_1_Edwards
_Renate _17-CV-
04891_1

PLAINTIFFS' LAST NAME - Edwards
PLAINTIFFS' FIRST NAME - Renate
CASE NO. - 17-CV-04891
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) -
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 03
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION -
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhard
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlieb.com, dlee@bernlieb.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 5, 2018

VIA EMAIL AND U.S. MAIL

Christopher Coffin
Pendley, Baudin & Coffin L.L.P.
24110 Eden St.P.O. Drawer 71
Plaquemine, LA 70765
ccoffin@pbclawfirm.com, nrockforte@pbclawfirm.com
jperez@pbclawfirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Spry, John et al v. 3M Company et al Case No.: 0:17-cv-05199-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Spry
Plaintiffs' First Name	John R
Case No.	0:17-cv-05199
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Pendley, Baudin & Coffin LLP
I.03.e - Plaintiffs' Counsel's Email	sshirey@pbclawfirm.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 24, 2018

VIA EMAIL AND U.S. MAIL

Christopher Coffin
Pendley, Baudin & Coffin L.L.P.
24110 Eden St.P.O. Drawer 71
Plaquemine, LA 70765
ccoffin@pbclawfirm.com, nrockforte@pbclawfirm.com
jperez@pbclawfirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Picuri, David v. 3M Company et al Case No.: 0:17-cv-05200-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Picuri
Plaintiffs' First Name	David
Case No.	0:17-cv-05200
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Pendley, Baudin
I.03.e - Plaintiffs' Counsel's Email	sshirey@pbclawfirm.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 5, 2018

VIA EMAIL AND U.S. MAIL

Christopher Coffin
Pendley, Baudin & Coffin L.L.P.
24110 Eden St.P.O. Drawer 71
Plaquemine, LA 70765
ccoffin@pbclawfirm.com, nrockforte@pbclawfirm.com
jperez@pbclawfirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Reed, Tommy et al v. 3M Company et al Case No.: 0:17-cv-05202-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Reed
Plaintiffs' First Name	Tommy
Case No.	0:17-cv-05202
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Pendley, Baudin & Coffin LLP
I.03.e - Plaintiffs' Counsel's Email	sshirey@pbclawfirm.com



Benjamin W. Hulse
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E-Mail: bhulse@blackwellburke.com

April 17, 2018

VIA EMAIL AND U.S. MAIL

Daniel C. Burke
Bernstein Liebhard LLP
10 E. 40th Street
New York, NY 10016
dburke@bernlieb.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Johnston, Todd v. 3M Company et al Case No.: 0:17-cv-05270-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Johnston_Todd_017-cv-05270_1_Johnston_Todd_017-cv-05270_1"

Johnston_Todd_017-
cv-
05270_1_Johnston_To
dd_017-cv-05270_1

PLAINTIFFS' LAST NAME - Johnston
PLAINTIFFS' FIRST NAME - Todd
CASE NO. - 0:17-cv-05270
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS- 7
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS- 1
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION -
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhard
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlieb.com, dlee@bernlieb.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

June 18, 2018

VIA EMAIL AND U.S. MAIL

Jason C. Webster
The Webster Law Firm
6200 Savoy Suite 150
Houston, TX 77036
filing@thewebsterlawfirm.com, lguerrero@thewebsterlawfirm.com
jwebster@thewebsterlawfirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Gilmore, Kenneth et al v. 3M Company et al Case No.: 0:17-cv-05271-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Gilmore
Plaintiffs' First Name	Kenneth
Case No.	0:17-cv-05271
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Webster Law
I.03.e - Plaintiffs' Counsel's Email	filing@thewebsterlawfirm.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

April 17, 2018

VIA EMAIL AND U.S. MAIL

Daniel C. Burke
Bernstein Liebhard LLP
10 E. 40th Street
New York, NY 10016
dburke@bernlieb.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Billings, Willard v. 3M Company et al Case No.: 0:17-cv-05277-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Billings_Willard_17-cv-05277_1_Billings_Willard_17-cv-05277_1"

Billings_Willard_17-
cv-
05277_1_Billings_Willi
ard_17-cv-05277_1

PLAINTIFFS' LAST NAME - Billings
PLAINTIFFS' FIRST NAME - Willard
CASE NO. - 17-cv-05277
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 02, 05, 07, 08, 09
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 03
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANT) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION -
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhart
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlieb.com, dlee@bernlieb.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

August 15, 2018

VIA EMAIL AND U.S. MAIL

Travis R. Walker
The Law offices of Travis R. Walker, P.A.
1235 SE Indian Street, Suite 101
Stuart, Florida 34997
traviswalker@traviswalkerlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Robinson, Michael v. 3M Company et al Case No.: 0:18-cv-00263-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Robinson
Plaintiffs' First Name	Michael
Case No.	0:18-cv-00263
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	2
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	3
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	The Law Offices of Travis R Walker
I.03.e - Plaintiffs' Counsel's Email	service@traviswalkerlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

June 8, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Falcetta, Edward v. 3M Company Case No.: 0:18-cv-00432-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Falcetta
Plaintiffs' First Name	Edward
Case No.	0:18-cv-00432
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 18, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Darwick, Robert v. 3M Company Case No.: 0:18-cv-00670-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Darwick
Plaintiffs' First Name	Robert S.
Case No.	0:18-cv-00670
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 10, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Welch, Leon v. 3M Company Case No.: 0:18-cv-00674-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Welch
Plaintiffs' First Name	Leon
Case No.	0:18-cv-00674
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

June 29, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Wolf, Joyce v. 3M Company Case No.: 0:18-cv-00675-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Wolf
Plaintiffs' First Name	Joyce
Case No.	0:18-cv-00675
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 11, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Conrad, John v. 3M Company Case No.: 0:18-cv-00688-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Conrad
Plaintiffs' First Name	John W.
Case No.	0:18-cv-00688
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

June 29, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Hauser, Michael v. 3M Company Case No.: 0:18-cv-00691-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Hauser
Plaintiffs' First Name	Michael
Case No.	0:18-cv-00691
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 10, 2018

VIA EMAIL AND U.S. MAIL

Wesley G. Barr
The Olinde Firm, LLC
400 Poydras Street Suite 1980
New Orleans, LA 70130
wbarr@olindefirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Farrell, Thomas v. 3M Company et al Case No.: 0:18-cv-00803-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Farrell
Plaintiffs' First Name	Thomas
Case No.	0:18-cv-00803
Section I (Case Information)	Incomplete
Section I - Incomplete Questions	4
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	5, 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	The Olinde Firm, LLC
I.03.e - Plaintiffs' Counsel's Email	wbarr@olindefirm.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 9, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Snow, Lorraine v. 3M Company Case No.: 0:18-cv-00962-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Snow
Plaintiffs' First Name	Lorraine
Case No.	0:18-cv-00962
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 5, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Wolfe, Stanley v. 3M Company Case No.: 0:18-cv-00963-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Wolfe
Plaintiffs' First Name	Stanley
Case No.	0:18-cv-00963
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 10, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Branch, *Charles v. 3M Company* Case No.: 0:18-cv-00965-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Branch
Plaintiffs' First Name	Charles
Case No.	0:18-cv-00965
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 9, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Ramondo, Joseph v. 3M Company Case No.: 0:18-cv-01097-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Ramondo
Plaintiffs' First Name	Joseph
Case No.	0:18-cv-01097
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

August 15, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Rodliff, Peter v. 3M Company Case No.: 0:18-cv-01098-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Rodliff
Plaintiffs' First Name	Peter
Case No.	0:18-cv-01098
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 9, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Reid, Patricia v. 3M Company Case No.: 0:18-cv-01099-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Reid
Plaintiffs' First Name	Patricia
Case No.	0:18-cv-01099
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	6
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

June 19, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Roshell, Doreen v. 3M Company Case No.: 0:18-cv-01101-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Roshell
Plaintiffs' First Name	Doreen
Case No.	0:18-cv-01101
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 30, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Shade, Collette v. 3M Company Case No.: 0:18-cv-01113-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Shade
Plaintiffs' First Name	Collette
Case No.	0:18-cv-01113
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 9, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Scott, Margaret v. 3M Company Case No.: 0:18-cv-01119-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Scott
Plaintiffs' First Name	Margaret
Case No.	0:18-cv-01119
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

August 7, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Turnage, Dalton v. 3M Company Case No.: 0:18-cv-01122-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Turnage
Plaintiffs' First Name	Dalton
Case No.	0:18-cv-01122
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

June 19, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Twichell, Ben v. 3M Company Case No.: 0:18-cv-01123-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Twichell
Plaintiffs' First Name	Ben
Case No.	0:18-cv-01123
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
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July 30, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Yost, Michael v. 3M Company Case No.: 0:18-cv-01124-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Yost
Plaintiffs' First Name	Michael
Case No.	0:18-cv-01124
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
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August 6, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Johnson, Roger v. 3M Company Case No.: 0:18-cv-01171-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Johnson
Plaintiffs' First Name	Roger L.
Case No.	0:18-cv-01171
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
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July 24, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St. Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Cerbins, Rosemary v. 3M Company Case No.: 0:18-cv-01505-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Cerbins
Plaintiffs' First Name	Rosemary
Case No.	0:18-cv-01505
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
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August 14, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St - Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Mitchell, James v. 3M Company et al Case No.: 0:18-cv-01515-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Mitchell
Plaintiffs' First Name	James
Case No.	0:18-cv-01515
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
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E-Mail: bhulse@blackwellburke.com

July 24, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St. Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Custer, Nettie v. 3M Company Case No.: 0:18-cv-01517-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Custer
Plaintiffs' First Name	Nettie
Case No.	0:18-cv-01517
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com

EXHIBIT C

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

)	
)	
In Re: Bair Hugger Forced Air)	File No. 15-MD-2666
Warming Devices Products)	(JNE/DTS)
Liability Litigation)	
)	August 16, 2018
)	Minneapolis, Minnesota
)	Courtroom 12W
)	9:50 a.m.
)	
)	

BEFORE THE HONORABLE JOAN N. ERICKSEN
UNITED STATES DISTRICT COURT JUDGE

THE HONORABLE DAVID T. SCHULTZ
UNITED STATES MAGISTRATE JUDGE

(STATUS CONFERENCE)APPEARANCES

FOR THE PLAINTIFFS:	MESHBESHER & SPENCE LTD. Genevieve M. Zimmerman 1616 Park Avenue Minneapolis, MN 55404
	PRITZKER HAGEMAN David Szerlag 45 South Seventh Street Plaza Seven Building, Ste. 2950 Minneapolis, MN 55402
	CIRESI CONLIN LLP Michael A. Sacchet 225 South Sixth Street Suite 4600 Minneapolis, MN 55402
	KENNEDY HODGES LLP David W. Hodges 711 West Alabama Street Houston, TX 77006

1 THE COURT: Okay. On these eight cases, Mr. Lee,
2 you have got two weeks to cure these deficiencies.

3 And when counsel is before Judge Schultz next or
4 whenever you are next in front of him, hammer this out. And
5 if there's some amendment that needs to be made, I am not
6 seeing it right now, but if there is something, then we can
7 bring that up.

8 But, Mr. Lee, you have got two weeks to cure your
9 deficiencies.

10 Mr. Nigh, I'd get those deficiencies definitely
11 cured before the next pretrial conference so that we -- so
12 that when we -- if there's a motion on your 50 cases, we
13 have got all the information necessary and we can have a
14 meaningful conversation about them.

15 Ms. Zimmerman, is that --

16 MS. ZIMMERMAN: That's fine. Thank you, Your
17 Honor.

18 THE COURT: Okay. All right. So that's how we
19 will take care of that.

20 Now, on the Rule 11 motion on the 169 cases.

21 MR. HULSE: I'm going to call up my colleague Mary
22 Young at this point.

23 THE COURT: Yes, Ms. Young.

24 My first problem with this motion has to do with
25 the timing and the safe harbor. And I know that there are

1 exceptions to the safe harbor, but absent invocation of one
2 of those what I consider to be very extraordinary
3 exceptions, why is the failure to give the 21 days not
4 reason enough to deny this motion?

5 MS. YOUNG: Well, Your Honor, the motion that's
6 before the court is not asking for any sanction. It's
7 asking for the rule -- the order to show cause under Rule
8 11(c). And at that point is when we would ask that a
9 sanction of dismissal with prejudice be entered for any case
10 where they have not come forward and amended the PFS to show
11 that the product was in fact used and had the right
12 evidentiary support for that contention.

13 THE COURT: Fair enough. But I think about let's
14 say I do that. Then I have to go through all of these,
15 right? I don't even have the PFSs. I mean, I would just
16 have to take your word on what's in them. So first I would
17 have to get the PFSs, because those aren't filed with the
18 court, so I don't know whether they are really deficient. I
19 mean, I would have to get them and then individually docket
20 every one of the responses that comes in on the motion. And
21 we have the PFS process that contrary to the discussion we
22 just had, which makes it look like -- I mean, we had a
23 little lump, bump in the road there, but basically we have a
24 process by which these many, many cases can be addressed
25 without individual attention from the court. And so my

1 inclination is to consider this motion to be firm notice to
2 the plaintiffs who are listed in these 169 cases of
3 significant and serious deficiencies in the PFS, but to
4 allow those cases to go through that process that has
5 essentially been working pretty well and doesn't -- well,
6 it's been working pretty well.

7 Am I missing something? I know you don't agree
8 with that approach, but am I missing some fundamental
9 component here?

10 MS. YOUNG: Well, Your Honor, our view on this
11 question is that this goes to really a threshold issue --
12 it's been before the court on numerous occasions -- Are
13 these actual product liability cases that relate to the Bair
14 Hugger. So it's not so much that there is a deficiency in
15 the response. This really goes to a threshold issue of Is
16 there a claim. And as we have seen in the history of this
17 litigation, there have been very serious issues with that.
18 We had two of five bellwether cases fall out after
19 significant resources.

20 You put in place a mechanism by which we would try
21 to get to product ID in the second pool, and it ended up we
22 negotiated with Judge Noel that we would just put those
23 issues to the side, but we do see that we are going to need
24 court intervention substantively because the parties
25 fundamentally disagree as to what it is. It's required to

1 show proof of product use here. And these are just really
2 the tip of the iceberg. These are cases where the
3 plaintiffs in their own verified response have said we don't
4 have evidence the product was used. And so our view was we
5 want to come to the court and have -- ask for the court's
6 guidance in how best to begin to address what we see as very
7 significant issues with the validity of many, many cases in
8 the docket.

9 THE COURT: Here's the issue that I have with
10 considering an attorney sanction motion based on a PFS that
11 may have been answered only by the plaintiff him or herself.
12 I completely agree that we worked very hard on coming up
13 with a PFS process so that we can have -- we can separate
14 the wheat from the chaff. And it's disheartening to the
15 court to learn that plaintiffs and their counsel in some
16 rare instances may not be cooperating with the spirit of
17 that and just have a plaintiff submit something and don't do
18 any individual research. And I certainly understand where
19 Rule 11 would cross your mind in that situation.

20 I'm not going to entertain the -- I'm not going to
21 do what you want now, but I also am not going to continue,
22 if we have so far, countenancing a plaintiff's response that
23 we handed it to the plaintiff, the plaintiff didn't know
24 anything and so here we are and we are not going to do
25 anything more.

1 So the question is, Who is going to go through
2 each one of these cases and make sure they are a real case?
3 And on the order to show cause, that's got to be me. And I
4 just think that's not -- doesn't have to be me. I'm happy
5 to do it if it has to be, but it shouldn't have to be,
6 because here you say plaintiff says no. I don't know what
7 the attorney says. And I want the attorney to say it -- you
8 know, I want you and the attorneys, and this will be Ms.
9 Zimmerman and her crew, to work it out and figure out
10 whether there really is a case. And then if you have got
11 somebody who is told there is a PFS deficiency, they are
12 told they have to tell whether there is a case, they still
13 don't do it, then come to me in those cases, but I hope we
14 don't have 165 plus or a hundred -- whatever it is, the
15 breakdown. I hope we don't have 169 cases where that is the
16 case.

17 So I am going to put this on your list of things
18 to discuss before you come back to court before Judge
19 Schultz and hopefully work out some sort of a resolution;
20 and if not, then bring it to Judge Schultz's attention.
21 Okay?

22 MS. YOUNG: Okay. Thank you, Your Honor.

23 THE COURT: Thank you.

24 Ms. Zimmerman, I didn't hear from you on that,
25 but --

EXHIBIT D



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

November 6, 2018

David J. Szerlag
Pritzker Hageman, P.A.
Suite 2950
45 South Seventh Street
300 South Fourth Street
Minneapolis, MN 55402

RE: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 15-2666-JNE-DTS

Dear Mr. Szerlag:

Please circulate this notice to all plaintiffs' counsel of record.

We write to set out 3M's expectations concerning the product-use questions in Section III.1 of the Plaintiff Fact Sheets. As this MDL has progressed, we have become increasingly concerned that many plaintiffs – perhaps hundreds – lack adequate evidence of Bair Hugger usage. Therefore, beginning with PFSs reviewed after August 16, 2018, we have been issuing deficiency notices in these circumstances:

- First, where a plaintiff responds “no” to whether he or she has information that the Bair Hugger system was used. 3M's position is that such cases should never have been filed in the first place, and should now be dismissed.
- Second, where a plaintiff fails to identify the specific medical records or document he or she relies upon as proof of Bair Hugger use. The plaintiff must provide sufficient detail for 3M to readily identify the documents relied upon without having to review hundreds or thousands of pages of records. (Of course, the documents should be provided along with the PFS.) The documents relied upon should be referenced by document name and page/Bates number if available.
 - Examples of deficient descriptions include: “Records,” “Medical Records,” “Surgical Records,” “Records from 9/7/18 surgery,” or “Records from St. Mary's.”

David J. Szerlag
November 6, 2018
Page 2

- Examples of sufficient descriptions include: “Medical record Bates number JN007 included with St. Mary’s records,” “See medical records attached as ‘BH Proof’ stating ‘BH upper,’” or “4/17/18 record from St. Mary’s page number 22.”
- Third, when a plaintiff fails to state the date Bair Hugger use was discovered, either by the plaintiff or counsel (whichever was first). As the Court has noted, this information is vital for the parties to determine whether the plaintiff has a viable, non-time-barred claim.
 - Examples of deficient responses include: “After surgery,” “After review of medical records,” or “After consulting with counsel.”
 - Examples of proper responses include: “4/3/18,” or if the precise date is not known, “early April 2018.”

Going forward, when you receive a deficiency notice for Section III.1, please reference this letter.

Finally, 3M’s position is that all plaintiffs have an obligation to supplement previously submitted PFSs to include the information described above, to the extent not previously provided. For those plaintiffs’ firms who consent in writing, 3M will agree to the following:

- When a plaintiff supplements a PFS that was submitted before August 16, 2018, we will not insist on an updated verification if the supplement is solely made for specifically identifying the record(s) establishing product use. We will insist on an updated verification, however, when a plaintiff supplements Section III.1 to add any other information, such as the date Bair Hugger use was discovered.
- Through November 30 only, 3M will consent to dismissals without prejudice for cases where plaintiffs’ counsel confirms in writing that they have been unable to identify the patient warming technology (if any) used in his or her surgery. We will not agree to a dismissal without prejudice, however, where medical records indicate the use of some other patient warming technology, such as the Augustine HotDog or Stryker Mistral. Those cases must be dismissed with prejudice. We also will not agree to tolling.

Sincerely,



Benjamin W. Hulse

BWH/ck

EXHIBIT E

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

)
)
In Re: Bair Hugger Forced Air) File No. 15-MD-2666
Warming Devices Products) (JNE/FLN)
Liability Litigation)
) October 18, 2018
) Minneapolis, Minnesota
) Courtroom 12W
) 9:45 a.m.
)
)

BEFORE THE HONORABLE JOAN N. ERICKSEN
UNITED STATES DISTRICT COURT JUDGE

And THE HONORABLE DAVID T. SCHULTZ
UNITED STATES MAGISTRATE JUDGE

(STATUS CONFERENCE)

APPEARANCES

FOR THE PLAINTIFFS:

MESHBESHER & SPENCE
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Houston, TX 77002

1 And the reason I thought that might be useful to Your Honor
2 and talking with defense counsel, so there have been 216
3 cases that have been filed in the last 90 days. That's
4 important because pretrial order number 14 really deals with
5 these kinds of issues that continue to come up with respect
6 to is there really a product ID issue, all of that, because
7 pretrial order 14, of course, sets forth how they can
8 challenge that.

9 For all but those 216 cases, they've already had
10 the opportunity to look through the plaintiff fact sheet and
11 to the extent that there are any kind of deficiencies,
12 including with respect to product ID, there would already be
13 a motion brought to this Court to have it dismissed.

14 So to the extent that there are ongoing
15 representations that there are problems with a bloated
16 docket where there's not really proof of product, that's not
17 reflected in the kind of motions that have been brought to
18 the Court.

19 So because in pretrial order 14, any plaintiff has
20 I think it's 90 days to file a fact sheet, and then based on
21 that Order, the defendants then have four weeks to challenge
22 with respect to any kind of core deficiencies, one of which
23 is proof of product.

24 So to the extent that we are through that kind of
25 time period, we do know that there haven't been motions on

EXHIBIT F

From: Ben Hulse

Sent: Friday, October 12, 2018 1:39 PM

To: 'JoanEricksen_Chambers@mnd.uscourts.gov' <JoanEricksen_Chambers@mnd.uscourts.gov>;

'schultz_chambers@mnd.uscourts.gov' <schultz_chambers@mnd.uscourts.gov>

Cc: 'Genevieve Zimmerman - Meshbeshier & Spence' (gzimmerman@meshbeshier.com)

<gzimmerman@meshbeshier.com>; 'Gabriel Assaad' (gassaad@kennedyhodes.com)

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Gordon' (bgordon@levinlaw.com)' <bgordon@levinlaw.com>; Jerry Blackwell

<blackwell@blackwellburke.com>; Lyn Pruitt <LPruitt@mwlaw.com>; 'David Szerlag'

<david@pritzkerlaw.com>; Bridget Ahmann <Bridget.Ahmann@FaegreBD.com>; Mary Young

<myoung@blackwellburke.com>; David Hodges <dhodges@kennedyhodes.com>

Subject: Bair Hugger, MDL 2666 -- Joint Agenda and Report for October 15 Status Conference

Dear Judge Ericksen and Judge Schultz,

In accordance with Pretrial Order No. 3, attached is the parties' Joint Agenda and Report for the status conference scheduled for Thursday, October 15. Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Agenda, are also attached to this email.

Best regards,

Ben Hulse

Benjamin W. Hulse

Blackwell Burke P.A.

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

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Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated October 12, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-00802-JNE-DTS	Brown, Charles v. 3M Company et al	3/23/2018	6/21/2018	7/13/2018 8/10/2018 9/17/2018	The Olinde Firm, LLC
0:18-cv-00840-JNE-DTS	Stidham, Robert et al v. 3M Company et al	3/26/2018	6/24/2018	7/13/2018 8/10/2018 9/17/2018	Fears Nachawati, PLLC
0:18-cv-00842-JNE-DTS	Wiggins, Francis v. 3M Company et al	3/26/2018	6/24/2018	7/13/2018 8/10/2018 9/17/2018	Fears Nachawati, PLLC
0:18-cv-01175-JNE-DTS	Collins, Jean v. 3M Company et al	4/30/2018	7/29/2018	8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:18-cv-01283-JNE-DTS	Winegar, Connie v. 3M Company et al	5/8/2018	8/6/2018	8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:18-cv-00264-JNE-DTS	Wega, Salvatore v. 3M Company et al	1/29/2018	4/29/2018	9/17/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-01362-JNE-DTS	DeSimone, Sandra v. 3M Company et al	5/17/2018	8/15/2018	9/17/2018	Kennedy Hodges, LLP
0:18-cv-01435-JNE-DTS	Swatchick, Lou Todd et al v. 3M Company et al	5/25/2018	8/23/2018	9/17/2018	Meshbesher & Spence
0:18-cv-01455-JNE-DTS	Matteo, Barbara v. 3M Company et al	5/25/2018	8/23/2018	9/17/2018	Morris Law Firm
0:18-cv-01456-JNE-DTS	Manheim, Kathleen v. 3M Company et al	5/25/2018	8/23/2018	9/17/2018	Morris Law Firm
0:18-cv-01542-JNE-DTS	Davis, Harry v. 3M Company et al	6/4/2018	9/2/2018	9/17/2018	Schlichter Bogard & Denton, LLP
0:18-cv-01613-JNE-DTS	Dobeck, Donna v. 3M Company et al	6/8/2018	9/6/2018	9/17/2018	Kennedy Hodges, LLP
0:18-cv-01646-JNE-DTS	Beulke, David v. 3M Company et al	6/13/2018	9/11/2018		Davis & Crump, P.C.
0:18-cv-01692-JNE-DTS	Shumpert, David et al v. 3M Company et al	6/19/2018	9/17/2018		Meshbesher & Spence
0:18-cv-01707-JNE-DTS	Spriggs, Connie v. 3M Company et al	6/21/2018	9/19/2018		The Miller Firm, LLC
0:18-cv-01708-JNE-DTS	Keller, Kenneth v. 3M Company et al	6/21/2018	9/19/2018		The Miller Firm, LLC
0:18-cv-01738-JNE-DTS	McClain, Allen v. 3M Company et al	6/25/2018	9/23/2018		Bernstein Liebhard LLP
0:18-cv-01747-JNE-DTS	Hendrickson, Craig v. 3M Company et al	6/26/2018	9/24/2018		Davis & Crump, P.C.
0:18-cv-01828-JNE-DTS	Snyder, Robert v. 3M Company et al	6/29/2018	9/27/2018		Kirtland & Packard LLP
0:18-cv-01861-JNE-DTS	Barnett, Mark v. 3M Company et al	7/3/2018	09/31/2018		Meshbesher & Spence
0:18-cv-01870-JNE-DTS	Pasko, Dorothy v. 3M Company et al	7/3/2018	09/31/2018		Davis & Crump, P.C.
0:18-cv-01878-JNE-DTS	Spry, Geraldine v. 3M Company et al	7/5/2018	10/3/2018		McEwen Law Firm, Ltd.

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated October 12, 2018)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-04881-JNE-DTS	Potter, Karen v. 3M Company et al	5/7/2018 07/10/2018	7/31/2018	8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:17-cv-04891-JNE-DTS	Edwards, Renate v. 3M Company et al	4/17/2018	5/8/2018	6/15/2018 7/13/2018 8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:17-cv-05270-JNE-DTS	Johnston, Todd v. 3M Company et al	4/17/2018	5/8/2018	6/15/2018 7/13/2018 8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:17-cv-05277-JNE-DTS	Billings, Willard v. 3M Company et al	4/17/2018	5/8/2018	6/15/2018 7/13/2018 8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:18-cv-00045-JNE-DTS	Swales, Bertha v. 3M Company et al	5/7/2018 07/10/2018	7/31/2018	8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:18-cv-00207-JNE-DTS	Guenther, Gary v 3M Company et al	8/6/2018	8/27/2018	9/17/2018	Bernstein Liebhard LLP
0:18-cv-00275-JNE-DTS	Owens, Janis v. 3M Company et al	7/31/2018	8/21/2018	9/17/2018	Bernstein Liebhard LLP
0:18-cv-00318-JNE-DTS	Amador, George v. 3M Company et al	7/5/2018	7/26/2018	9/17/2018	DeGaris & Rogers, LLC
0:18-cv-00575-JNE-DTS	Ballasso, Marilyn v. 3M Company et al	6/27/2018	7/18/2018	8/10/2018 9/17/2018	Gustafson Gluek PLLC
0:18-cv-00891-JNE-DTS	Winn, Robert v. 3M Company et al	7/24/2018	8/14/2018	9/17/2018	Murray Law Firm
0:17-cv-00088-JNE-DTS	Malinski, Michael v. 3M Company et al	bresno	10/2/2018		Gustafson Gluek PLLC
0:18-cv-00617-JNE-DTS	Hayes, Carol v. 3M Company et al	9/4/2018	9/25/2018		Schlichter, Bogard & Denton, LLP
0:18-cv-00998-JNE-DTS	Caison, John et al v. 3M Company et al	8/22/2018	9/12/2018		Gustafson Gluek PLLC
0:18-cv-01069-JNE-DTS	Grable, Richard v. 3M Company et al	9/4/2018	9/25/2018		Meshbesher & Spence
0:18-cv-01398-JNE-DTS	Albert, Roy v. 3M Company et al	9/17/2018	10/8/2018		Gustafson Gluek PLLC
0:18-cv-01416-JNE-DTS	Carter, Gregory v. 3M Company et al	9/10/2018	10/1/2018		The Olinde Firm, LLC
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-05371-JNE-DTS	Bresnock, Anne v. 3M Company et al	9/4/2018	10/2/2018	6/15/2018 7/13/2018 8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:18-cv-00167-JNE-DTS	Shoaf et al v. 3M Company, et al.	6/4/2018	6/25/2018	7/13/2018 8/10/2018 9/17/2018	The Miller Firm, LLC

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Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated October 12, 2018)

0:17-cv-03549-JNE-DTS	Salinas, Juan v. 3M Company et al	7/10/2018	7/31/2018	9/17/2018	Kennedy Hodges, L.L.P.
0:17-cv-05083-JNE-DTS	Meredith, Benjamin v. 3M Company et al	7/17/2018		9/17/2018	DeGaris & Rogers, LLC
0:17-cv-03143-JNE-DTS	Keel, James v. 3M Company et al	7/10/2018	7/31/2018		Kennedy Hodges, LLP
0:17-cv-04467-JNE-DTS	Adams, Artis v. 3M Company et al	4/2/2018	4/23/2018		Gustafson Gluek PLLC
0:17-cv-04885-JNE-DTS	McEvoy, Mark v. 3M Company et al	9/4/2018	9/25/2018		Bernstein Liebhard LLP
0:17-cv-04889-JNE-DTS	Thornton, Mildred v. 3M Company et al	9/4/2018	9/25/2018		Bernstein Liebhard LLP
0:17-cv-05261-JNE-DTS	Hardy, Alan v. 3M Company et al	9/4/2018	9/25/2018		Bernstein Liebhard LLP
0:18-cv-00451-JNE-DTS	Gregg, Cynthia v. 3M Company et al	9/10/2018	10/1/2018		Gustafson Gluek PLLC
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-04754-JNE-DTS	Weaver, Donna v. 3M Company et al	6/19/2018	7/10/2018	8/10/2018 9/14/2018	Kennedy Hodges, L.L.P.
0:17-cv-03259-JNE-DTS	Folmer, Gwendolyn v. 3M Company et al	8/2/2018	8/23/2018		Kennedy Hodges, L.L.P.
0:17-cv-04302-JNE-DTS	Tilley, William v. 3M Company et al	9/10/2018	10/1/2018		The Olinde Firm, LLC
0:17-cv-04476-JNE-DTS	Holstine, Rachel v. 3M Company et al	9/12/2018	10/3/2018		Bernstein Liebhard LLP
0:17-cv-04777-JNE-DTS	Pine, Randy v. 3M Company et al.	9/4/2018	9/25/2018		Bernstein Liebhard LLP

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).
Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated October 12, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:17-cv-01701-JNE-DTS	Wright, Michael v. 3M Company	6/22/2017	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:17-cv-02426-JNE-DTS	Johnson, Edwards et al v. 3M Company	6/22/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-02901-JNE-DTS	Moore, Michael v. 3M Company et al	2/14/2018	8/10/2018 9/17/2018	Kennedy Hodges, L.L.P.
0:17-cv-04967-JNE-DTS	Ewing, Kelly v. 3M Company	6/22/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:17-cv-05327-JNE-DTS	Lykes-Tarver, Tracy v. 3M Company	6/18/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:17-cv-05426-JNE-DTS	Meyers, Leslie v. 3M Company	7/10/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-00262-JNE-DTS	Brabham, Earnest v. 3M Company et al	6/18/2018	8/10/2018 9/17/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-00665-JNE-DTS	Hughes, Wilbert v. 3M Company et al	7/5/2018	8/10/2018 9/17/2018	Bachus & Schanker, LLC
0:18-cv-00676-JNE-DTS	Bunk, Susan v. 3M Company	7/5/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:18-cv-00690-JNE-DTS	Dupont, Roy v. 3M Company	7/5/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:18-cv-01137-JNE-DTS	Chapman, Joann v. 3M Company	6/11/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01154-JNE-DTS	Lombardo, James v. 3M Company	7/3/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01345-JNE-DTS	Lane, Tonya v. 3M Company et al	7/23/2018	8/10/2018 9/17/2018	Meshbesher & Spence
0:17-cv-01703-JNE-DTS	Ussery, Bruce v. 3M Company	6/22/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-04778-JNE-DTS	Brown, Ina v. 3M Company et al.	4/17/2018	9/17/2018	Bernstein Liebhard LLP
0:17-cv-05047-JNE-DTS	Clark, Georgia v. 3M Company et al	6/18/2018	9/17/2018	Schlichter Bogard & Denton, LLP
Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated October 12, 2018)

0:17-cv-05348-JNE-DTS	Wilmer, Roxanne v. 3M Company et al	7/2/2018	8/10/2018 9/17/2018	Schlichter Bogard & Denton, LLP
0:18-cv-00159-JNE-DTS	Roberts, Solomon et al v. 3M Company et al	6/18/2018	9/17/2018	Morgan & Morgan Complex Litigation Group
0:18-cv-00348-JNE-DTS	Smith, Dorothy v. 3M Company et al	7/16/2018	9/17/2018	The Miller Firm, LLC
0:18-cv-00432-JNE-DTS	Falcetta, Edward v. 3M Company	6/8/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00481-JNE-DTS	Brann, Stefan v. 3M Company et al	7/9/2018	9/17/2018	Lockridge, Grindal Nauen P.L.L.P.
0:18-cv-00670-JNE-DTS	Darwick, Robert v. 3M Company	7/18/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00674-JNE-DTS	Welch, Leon v. 3M Company	7/10/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00675-JNE-DTS	Wolf, Joyce v. 3M Company	6/29/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00688-JNE-DTS	Conrad, John v. 3M Company	7/11/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00689-JNE-DTS	Alexander, Todd v. 3M Company	7/16/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00691-JNE-DTS	Hauser, Michael v. 3M Company	6/29/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00740-JNE-DTS	McKinney, Kimberly et al v. 3M Company et al	7/16/2018	9/17/2018	Schlichter Bogard & Denton, LLP
0:18-cv-00884-JNE-DTS	Bosarge, Judy v. 3M Company	7/10/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-00962-JNE-DTS	Snow, Lorraine v. 3M Company	7/9/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00963-JNE-DTS	Wolfe, Stanley v. 3M Company	7/5/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00965-JNE-DTS	Branch, Charles v. 3M Company	7/10/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01096-JNE-DTS	Phillips, Virginia v. 3M Company	7/9/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated October 12, 2018)

0:18-cv-01097-JNE-DTS	Ramondo, Joseph v. 3M Company	7/9/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01099-JNE-DTS	Reid, Patricia v. 3M Company	7/9/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01101-JNE-DTS	Roshell, Doreen v. 3M Company	6/19/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01102-JNE-DTS	Tate, Melvin v. 3M Company	7/30/2018	9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01113-JNE-DTS	Shade, Collette v. 3M Company	7/30/2018	9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01119-JNE-DTS	Scott, Margaret v. 3M Company	7/9/2018	9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01123-JNE-DTS	Twichell, Ben v. 3M Company	6/19/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01139-JNE-DTS	Clark, Lasonia v. 3M Company	6/8/2018	8/10/2018 9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01510-JNE-DTS	Butters, Kenneth v. 3M Company	7/24/2018	9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01517-JNE-DTS	Custer, Nettie v. 3M Company	7/24/2018	9/17/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:15-cv-04491-JNE-DTS	Morris, Lorraine (OBO Nicolas J. Morris) v. 3M Company et al	8/3/2018		Hausfeld, LLP
0:16-cv-00798-JNE-DTS	(Kohout), Barnes, Shirley v. 3M Company	8/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:16-cv-04161-JNE-DTS	Bond, Karen (OBO Thomas Bond) v. 3M Company	8/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:16-cv-04304-JNE-DTS	Reetz, Harvey and Renee et al v. 3M Company et al	8/7/2018		Brown & Crouppen, PC
Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:17-cv-01942-JNE-DTS	McCrary, Lisa (OBO Alice McClain) v. 3M Company et al	8/3/2018		Brown & Crouppen, PC

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated October 12, 2018)

0:17-cv-03593-JNE-DTS	Jordan H. Kohler v. 3M Company et al	7/31/2018		Pogust, Braslow & Millrood, LLC
0:17-cv-04169-JNE-DTS	Hurley, Jonathan v. 3M Company et al	4/2/2018 9/12/2018		The Olinde Firm, LLC
0:17-cv-04517-JNE-DTS	Henderson, Stephanie v. 3M Company et al	8/30/2018		Bernstein Liebhard LLP
0:17-cv-05199-JNE-DTS	Spry, John et al v. 3M Company et al	7/5/2018		Pendley, Baudin & Coffin L.L.P.
0:17-cv-05200-JNE-DTS	Picuri, David v. 3M Company et al	7/24/2018		Pendley, Baudin & Coffin L.L.P.
0:17-cv-05202-JNE-DTS	Reed, Tommy et al v. 3M Company et al	7/5/2018		Pendley, Baudin & Coffin L.L.P.
0:17-cv-05271-JNE-DTS	Gilmore, Kenneth et al v. 3M Company et al	6/18/2018		The Webster Law Firm
0:18-cv-00249-JNE-DTS	Glasscock, Elizabeth v. 3M Company et al	6/11/2018		DeGaris & Rogers, LLC
0:18-cv-00263-JNE-DTS	Robinson, Michael v. 3M Company et al	8/15/2018 8/17/2018 9/12/2018		The Law offices of Travis R. Walker, P.A.
0:18-cv-00760-JNE-DTS	Bazemore, Mary v. 3M Company et al	8/2/2018		Meshbeshner & Spence, LTD.
0:18-cv-00803-JNE-DTS	Farrell, Thomas v. 3M Company et al	7/10/2018		The Olinde Firm, LLC
0:18-cv-00804-JNE-DTS	Maehle, Mark v. 3M Company et al	7/10/2018		The Olinde Firm, LLC
0:18-cv-00877-JNE-DTS	Keithley, Gary et al v. 3M Company et al	7/23/2018		Murray Law Firm
0:18-cv-00903-JNE-DTS	Hall, Barbara v. 3M Company et al	8/2/2018		GoldenbergLaw, PLLC
0:18-cv-01007-JNE-DTS	Sweezy, Richard v. 3M Company et al	7/24/2018		Kennedy Hodges
0:18-cv-01033-JNE-DTS	Chase, Raymond v. 3M Company et al	8/16/2018 8/17/2018		The Miller Firm, LLC
0:18-cv-01036-JNE-DTS	Workentine, Patricia et al v. 3M Company et al	8/14/2018		Walters Law Firm, LLC
0:18-cv-01078-JNE-DTS	Menefee, Arthur v. 3M Company et al	8/17/2018		Randall J. Trost, P.C.
0:18-cv-01098-JNE-DTS	Rodliff, Peter v. 3M Company	8/15/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01110-JNE-DTS	Ryles, Patricia v. 3M Company	7/30/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01112-JNE-DTS	Willis, Curtis v. 3M Company	7/30/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated October 12, 2018)

0:18-cv-01114-JNE-DTS	Smith, Ronald v. 3M Company	8/7/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01122-JNE-DTS	Turnage, Dalton v. 3M Company	8/7/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01124-JNE-DTS	Yost, Michael v. 3M Company	7/30/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01155-JNE-DTS	Mackenzie, Bonnie v. 3M Company	8/6/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01171-JNE-DTS	Johnson, Roger v. 3M Company	8/6/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01245-JNE-DTS	Pozyski, Mary et al v. 3M Company et al	9/21/2018		Raizner Slania LLP
0:18-cv-01505-JNE-DTS	Cerbins, Rosemary v. 3M Company	7/24/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01511-JNE-DTS	Hunt, Shirley v. 3M Company	8/6/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01515-JNE-DTS	Mitchell, James v. 3M Company	8/14/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01518-JNE-DTS	Kirk, Catherine v. 3M Company	8/14/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01521-JNE-DTS	Pennington, Tommy v. 3M Company	8/7/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01769-JNE-DTS	McCoy, Ethel v. 3M Company	8/14/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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EXHIBIT G

From: Ben Hulse

Sent: Friday, November 09, 2018 4:21 PM

To: [JoanEricksen Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov); [schultz chambers@mnd.uscourts.gov](mailto:schultz_chambers@mnd.uscourts.gov)

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Subject: RE: Bair Hugger, MDL 2666 -- Joint Agenda and Report for November 15 Status Conference

Dear Judge Ericksen and Judge Schultz,

In accordance with Pretrial Order No. 3, attached is the parties' Joint Agenda and Report for the status conference scheduled for Thursday, November 15. Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Agenda, are also attached to this email.

Best regards,

Ben Hulse

Benjamin W. Hulse

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Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated November 9, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-00264-JNE-DTS	Wega, Salvatore v. 3M Company et al	1/29/2018	4/29/2018	9/17/2018 10/12/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-01435-JNE-DTS	Swatchick, Lou Todd et al v. 3M Company et al	5/25/2018	8/23/2018	9/17/2018 10/12/2018	Meshbesher & Spence
0:18-cv-01455-JNE-DTS	Matteo, Barbara v. 3M Company et al	5/25/2018	8/23/2018	9/17/2018 10/12/2018	Morris Law Firm
0:18-cv-01542-JNE-DTS	Davis, Harry v. 3M Company et al	6/4/2018	9/2/2018	9/17/2018 10/12/2018	Schlichter Bogard & Denton, LLP
0:18-cv-01692-JNE-DTS	Shumpert, David et al v. 3M Company et al	6/19/2018	9/17/2018	10/12/2018	Meshbesher & Spence
0:18-cv-01738-JNE-DTS	McClain, Allen v. 3M Company et al	6/25/2018	9/23/2018	10/12/2018	Bernstein Liebhard LLP
0:18-cv-01977-JNE-DTS	Corriher, Kimberlie v. 3M Company et al	7/13/2018	10/11/2018		Kennedy Hodges, LLP
0:18-cv-02052-JNE-DTS	Mackenzie, Bonnie v. 3M Company et al	7/19/2018	10/17/2018		Kennedy Hodges, LLP
0:18-cv-02067-JNE-DTS	Norton, Lloyd v. 3M Company et al	7/20/2018	10/18/2018		Meshbesher & Spence
0:18-cv-02082-JNE-DTS	English, Alfred v. 3M Company et al	7/20/2018	10/18/2018		Kennedy Hodges, LLP
0:18-cv-02087-JNE-DTS	Bellach, (Dimesa, Maria) v. 3M Company	7/23/2018	10/21/2018		Napoli Bern Ripka Shkolnik LLP
0:18-cv-02095-JNE-DTS	Jenkins, Carole v. 3M Company et al	7/23/2018	10/21/2018		Bachus & Schanker, LLC
0:18-cv-02117-JNE-DTS	Banks, Annina v. 3M Company et al	7/24/2018	10/22/2018		The Miller Firm, LLC
0:18-cv-02119-JNE-DTS	Markie, Patricia et al v. 3M Company et al	7/24/2018	10/22/2018		The Miller Firm, LLC
0:18-cv-02121-JNE-DTS	Bruso, Marie v. 3M Company et al	7/24/2018	10/22/2018		The Miller Firm, LLC
0:18-cv-02135-JNE-DTS	Black, Robert v. 3M Company et al	7/24/2018	10/22/2018		Kennedy Hodges, LLP
0:18-cv-02329-JNE-DTS	Kujawski, Paul v. 3M Company et al	8/9/2018	11/7/2018		Kennedy Hodges, LLP
0:18-cv-02339-JNE-DTS	Ramsey, David Lee v. 3M Company et al	8/9/2018	11/7/2018		Kirtland and Packard LLP
0:18-cv-02341-JNE-DTS	Hoff, Amber v. 3M Company et al	8/10/2018	11/8/2018		Kennedy Hodges, LLP

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Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated November 9, 2018)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-00275-JNE-DTS	Owens, Janis v. 3M Company et al	7/31/2018	8/21/2018	9/17/2018 10/12/2018	Bernstein Liebhard LLP
0:18-cv-00891-JNE-DTS	Winn, Robert v. 3M Company et al	7/24/2018	8/14/2018	9/17/2018 10/12/2018	Murray Law Firm
0:18-cv-01069-JNE-DTS	Grable, Richard v. 3M Company et al	9/4/2018	9/25/2018	10/12/2018	Meshbesher & Spence
0:18-cv-01416-JNE-DTS	Carter, Gregory v. 3M Company et al	9/10/2018	10/1/2018	10/12/2018	The Olinde Firm, LLC
0:18-cv-00572-JNE-DTS	Gauthier, Kim v. 3M Company et al	10/15/2018	11/5/2018		Schlichter, Bogard & Denton, LLP
0:18-cv-00757-JNE-DTS	Homsher, Larry v. 3M Company et al	10/10/2018	10/31/2018		Bernstein Liebhard LLP
0:18-cv-00929-JNE-DTS	Tillia, Jeffrey v. 3M Company et al	9/26/2018	10/17/2018		DeGaris & Rogers, LLC
0:18-cv-01223-JNE-DTS	Webber-Hartmann, Linda v. 3M Company et al	10/8/2018	10/29/2018		Kirtland & Packard LLP
0:18-cv-01254-JNE-DTS	Robbins, Robert v. 3M Company et al	9/19/2018	10/10/2018		Kennedy Hodges, LLP
0:18-cv-01320-JNE-DTS	Dickerson, Jean v. 3M Company et al	9/25/2018	10/16/2018		Meshbesher & Spence
0:18-cv-01412-JNE-DTS	Maher, Stephen v. 3M Company et al	10/8/2018	10/29/2018		Kirtland & Packard LLP
0:18-cv-01442-JNE-DTS	White, Rosemary v. 3M Company et al	9/19/2018	10/10/2018		Brown & Crouppen, PC
0:18-cv-01523-JNE-DTS	Butters, Kenneth v. 3M Company et al	10/15/2018	11/5/2018		Kirtland & Packard LLP
0:18-cv-01590-JNE-DTS	Sessoms, Ricky v. 3M Company et al	10/2/2018	10/23/2018		Kennedy Hodges, LLP
0:18-cv-01712-JNE-DTS	Sahr, Daryl v 3M Company et al	10/15/2018	11/5/2018		Kennedy Hodges, LLP
0:18-cv-01722-JNE-DTS	Woodard, George v. 3M Company et al	10/1/2018	10/22/2018		Pendley, Baudin & Coffin L.L.P.
0:18-cv-01724-JNE-DTS	Cooper, Roy et al v. 3M Company et al	10/15/2018	11/5/2018		Pendley, Baudin & Coffin L.L.P.
0:18-cv-01725-JNE-DTS	Heyward, Jacqueline v. 3M Company et al	10/15/2018	11/5/2018		Kennedy Hodges, LLP
0:18-cv-01753-JNE-DTS	McCloat, Kenneth v. 3M Company et al	10/8/2018	10/29/2018		Kennedy Hodges, LLP
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-03143-JNE-DTS	Keel, James v. 3M Company et al	7/10/2018	7/31/2018	10/12/2018	Kennedy Hodges, LLP
0:17-cv-03899-JNE-DTS	Pimentel, Carlos v. 3M Company et al	2/28/2017	10/21/18* See ECF 1376	5/12/2018 6/15/18	The Olinde Firm, LLC
0:17-cv-04467-JNE-DTS	Adams, Artis v. 3M Company et al	4/2/2018	4/23/2018	10/12/2018	Gustafson Gluek PLLC

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Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated November 9, 2018)

0:18-cv-00205-JNE-DTS	Shulz, Shelley v. 3M Company et al	10/16/2018	11/6/2018		Bernstein Liebhard LLP
0:18-cv-00220-JNE-DTS	Brasher, Michael v. 3M Company et al	10/15/2018	11/5/2018		Bernstein Liebhard LLP
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-04302-JNE-DTS	Tilley, William v. 3M Company et al	9/10/2018	10/1/2018	10/12/2018	The Olinde Firm, LLC
0:17-cv-03252-JNE-DTS	Gorbett, Jamie v. 3M Company et al	10/10/2018	10/31/2018		Bernstein Liebhard LLP
0:17-cv-03573-JNE-DTS	Parker, Lloyd v. 3M Company et al	10/11/2018	10/31/2018		Bernstein Liebhard LLP
0:17-cv-04009-JNE-DTS	Rude, Lynas v. 3M Company et al	10/10/2018	10/31/2018		Bernstein Liebhard LLP
0:17-cv-04375-JNE-DTS	Baker, David v. 3M Company et al	10/8/2018	10/29/2018		Bernstein Liebhard LLP
0:17-cv-04857-JNE-DTS	Murphy, Bennie v 3M et al	10/8/2018	10/29/2018		Bernstein Liebhard LLP

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated November 9, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:17-cv-05047-JNE-DTS	Clark, Georgia v. 3M Company et al	6/18/2018	9/17/2018 10/12/2018	Schlichter Bogard & Denton, LLP
0:16-cv-00798-JNE-DTS	(Kohout), Barnes, Shirley v. 3M Company	8/3/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:16-cv-04161-JNE-DTS	Bond, Karen (OBO Thomas Bond) v. 3M Company	8/3/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:17-cv-01703-JNE-DTS	Ussery, Bruce v. 3M Company	6/22/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-03593-JNE-DTS	Jordan H. Kohler v. 3M Company et al	7/31/2018	10/12/2018	Pogust, Braslow & Millrood, LLC
0:17-cv-04512-JNE-DTS	Cunningham, Mary v. 3M Company et al	2/12/2018		Bernstein Liebhard LLP
0:17-cv-04517-JNE-DTS	Henderson, Stephanie v. 3M Company et al	8/30/2018	10/12/2018	Bernstein Liebhard LLP
0:17-cv-04891-JNE-DTS	Edwards, Renate v. 3M Company et al	4/17/2018	6/15/2018 7/13/2018 8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:17-cv-05199-JNE-DTS	Spry, John et al v. 3M Company et al	7/5/2018	10/12/2018	Pendley, Baudin & Coffin L.L.P.
0:17-cv-05200-JNE-DTS	Picuri, David v. 3M Company et al	7/24/2018	10/12/2018	Pendley, Baudin & Coffin L.L.P.
0:17-cv-05202-JNE-DTS	Reed, Tommy et al v. 3M Company et al	7/5/2018	10/12/2018	Pendley, Baudin & Coffin L.L.P.
0:17-cv-05270-JNE-DTS	Johnston, Todd v. 3M Company et al	4/17/2018	6/15/2018 7/13/2018 8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:17-cv-05271-JNE-DTS	Gilmore, Kenneth et al v. 3M Company et al	6/18/2018	10/12/2018	The Webster Law Firm
0:17-cv-05277-JNE-DTS	Billings, Willard v. 3M Company et al	4/17/2018	6/15/2018 7/13/2018 8/10/2018 9/17/2018	Bernstein Liebhard LLP
0:18-cv-00263-JNE-DTS	Robinson, Michael v. 3M Company et al	9/12/2018	10/12/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-00318-JNE-DTS	Amador, George v. 3M Company et al		9/17/2018 10/12/2018	DeGaris & Rogers, LLC
0:18-cv-00432-JNE-DTS	Falcetta, Edward v. 3M Company	6/8/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated November 9, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00670-JNE-DTS	Darwick, Robert v. 3M Company	7/18/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00674-JNE-DTS	Welch, Leon v. 3M Company	7/10/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00675-JNE-DTS	Wolf, Joyce v. 3M Company	6/29/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00688-JNE-DTS	Conrad, John v. 3M Company	7/11/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00691-JNE-DTS	Hauser, Michael v. 3M Company	6/29/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00760-JNE-DTS	Bazemore, Mary v. 3M Company et al	8/2/2018	10/12/2018	Meshbesher & Spence, LTD.
0:18-cv-00803-JNE-DTS	Farrell, Thomas v. 3M Company et al	7/10/2018	10/12/2018	The Olinde Firm, LLC
0:18-cv-00804-JNE-DTS	Maehle, Mark v. 3M Company et al	7/10/2018	10/12/2018	The Olinde Firm, LLC
0:18-cv-00884-JNE-DTS	Bosarge, Judy v. 3M Company	7/10/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-00962-JNE-DTS	Snow, Lorraine v. 3M Company	7/9/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00963-JNE-DTS	Wolfe, Stanley v. 3M Company	7/5/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00965-JNE-DTS	Branch, Charles v. 3M Company	7/10/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-01007-JNE-DTS	Sweezy, Richard v. 3M Company et al	7/24/2018	10/12/2018	Kennedy Hodges
0:18-cv-01097-JNE-DTS	Ramondo, Joseph v. 3M Company	7/9/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01098-JNE-DTS	Rodliff, Peter v. 3M Company	8/15/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01099-JNE-DTS	Reid, Patricia v. 3M Company	7/9/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated November 9, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01101-JNE-DTS	Roshell, Doreen v. 3M Company	6/19/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01110-JNE-DTS	Ryles, Patricia v. 3M Company	7/30/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01112-JNE-DTS	Willis ,Curtis v. 3M Company	7/30/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01113-JNE-DTS	Shade, Collette v. 3M Company	7/30/2018	9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01119-JNE-DTS	Scott, Margaret v. 3M Company	7/9/2018	9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01122-JNE-DTS	Turnage, Dalton v. 3M Company	8/7/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01123-JNE-DTS	Twichell, Ben v. 3M Company	6/19/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01124-JNE-DTS	Yost, Michael v. 3M Company	7/30/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01171-JNE-DTS	Johnson, Roger v. 3M Company	8/6/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01505-JNE-DTS	Cerbins, Rosemary v. 3M Company	7/24/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01515-JNE-DTS	Mitchell, James v. 3M Company	8/14/2018	10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01517-JNE-DTS	Custer, Nettie v. 3M Company	7/24/2018	8/10/2018 9/17/2018 10/12/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-00088-JNE-DTS	Malinski, Michael v. 3M Company, et al	11/7/2018		Gustafson Gluek PLLC
0:17-cv-00712-JNE-DTS	Haladay, Jeffrey (OBO Harold Owens) v. 3M Company	8/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-00712-JNE-DTS	Haladay, Jeffrey (OBO Harold Owens) v. 3M Company	8/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated November 9, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:17-cv-04845-JNE-DTS	Murray, Dan v. 3M Company et al	10/2/2018		Kirtland and Packard LLP
0:18-cv-00093-JNE-DTS	Ashley, Ruth v. 3M Company et al	7/16/2018		Bernstein Liebhard LLP
0:18-cv-00151-JNE-DTS	Russell, Janice v. 3M Company et al	7/16/2018		Bernstein Liebhard LLP
0:18-cv-00274-JNE-DTS	Malone, Brenda v. 3M Company et al	7/16/2018		Bernstein Liebhard LLP
0:18-cv-00354-JNE-DTS	McDermott, Kevin et al v. 3M Company et al	7/18/2018		Parker Waichman
0:18-cv-00852-JNE-DTS	Villafranco, Leonard v. 3M Company et al	8/7/2018		The Law offices of Travis R. Walker, P.A.
0:18-cv-00959-JNE-DTS	Clavey, David v. 3M Company et al	8/31/2018		The Lanier Law Firm, PLLC
0:18-cv-00980-JNE-DTS	Calo, Phillip et al v. 3M Company et al	8/27/2018		Meshbesher & Spence
0:18-cv-00991-JNE-DTS	Hawkins, Loretta v. 3M Company et al	7/17/2018		DeGaris & Rogers, LLC
0:18-cv-01103-JNE-DTS	Tedford, Louise v. 3M Company	8/17/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01121-JNE-DTS	Stapley, William v. 3M Company	8/16/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01129-JNE-DTS	Parks, Sherry v. 3M Company et al	8/30/2018		The Miller Firm, LLC
0:18-cv-01130-JNE-DTS	Deloach, Marsha v. 3M Company et al	8/30/2018		The Miller Firm, LLC
0:18-cv-01167-JNE-DTS	Eans, James v. 3M Company	8/24/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01251-JNE-DTS	Monchinski, Michael v. 3M Company et al	8/30/2018		GoldenbergLaw, PLLC
0:18-cv-01272-JNE-DTS	McDermott, Donald v. 3M Company et al	8/31/2018		The Webster Law Firm
0:18-cv-01355-JNE-DTS	Watts, Raymond et al v. 3M Company et al	9/11/2018		Langdon and Emison
0:18-cv-01357-JNE-DTS	Goldstein, Jay v. 3M Company et al	9/11/2018		Skikos Crawford Skikos & Joseph
0:18-cv-01453-JNE-DTS	Barnes, Thomas v. 3M Company et al	9/20/2018		Goldenberg Law, PLLC
0:18-cv-01506-JNE-DTS	Easton, Elizabeth v. 3M Company	9/10/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated November 9, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01510-JNE-DTS	Butters, Kenneth v. 3M Company	7/24/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01579-JNE-DTS	Klanduch, Robert v. 3M Company et al	10/2/2018		Jones Ward, PLC

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